

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

TOWN OF FRAMINGHAM REQUEST FOR)	
DETERMINATION OF RATES APPLICABLE TO)	
TRANSPORTATION AND TREATMENT OF SEWAGE)	
PURSUANT TO INTERMUNICIPAL AGREEMENT)	
)	

D.T.E. 02-46

TOWN OF FRAMINGHAM'S FIRST SET OF INFORMATION
REQUESTS TO THE TOWN OF ASHLAND

The Town of Framingham ("Framingham") hereby submits its First Set of Information Requests to the Town of Ashland ("Ashland").

INSTRUCTIONS AND DEFINITIONS

1. Each request should be answered in accord with 220 C.M.R. § 1.06(6)(c) and the Ground Rules set forth in the Department's December 9, 2002 Memorandum.
2. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, microfilm, microfiche, computer printouts, correspondence, handwritten notes, bills, checks, and data available from a laptop, hard drive, or server, and any other data compilations from which information can be obtained.

INFORMATION REQUESTS

FRA 1-1. According to the November 6, 2001 report of Vollmer Associates, LLP ("Vollmer Report"), Ashland "had

estimated its proportionate share of O&M costs" for the 2001 fiscal year at \$16,568. (Vollmer Report, p. 4). What is the basis for Vollmer's assertion that Ashland had estimated costs in this amount? Please provide all documents in which this estimate is referenced, including all workpapers used to calculating this estimate.

FRA 1-2. According to the Vollmer Report, Ashland's proportionate share of O&M costs for the 2001 fiscal year should have been \$18,300. Please provide all workpapers supporting this calculation.

FRA 1-3. According to Ashland's Answer to the Petition, Ashland's proportionate share of O&M costs for the 2001 fiscal year should have been \$9,705. Please provide all workpapers supporting this calculation.

FRA 1-4. According to Ashland's responses to the Department's First Set of Information Requests, Ashland's proportionate share of O&M costs for the 2001 fiscal year should have been \$7,881. Please provide all workpapers supporting this calculation.

FRA 1-5. Please state the basis for Ashland's assertion that it uses 3.04% of Framingham's sewer system, and provide all documents supporting this contention.

FRA 1-6. Please provide copies of any intermunicipal agreements that apportion each municipality's share of O&M costs

for a sewer system based on the percentage of pipe utilized by each municipality.

FRA 1-7. Please describe how Ashland bills users of its sewer system. Specifically, please state whether Ashland bills its customers using a pro rata formula, a formula based on the actual pipes and other facilities utilized by each particular user, or some other methodology? Please provide copies of documents demonstrating Ashland's use of the specified methodology.

FRA 1-8. Please explain the rationale for using Inter-Basin Transfer ACT (IBT) flows in Ashland's proposed formula for calculating its share of O&M costs, as opposed to using actual measured flows. Please provide copies of any intermunicipal agreements that utilize IBT flows for apportioning O&M costs.

FRA 1-9. Please identify the "discrepancies in pipe lengths and sizes" referenced on page 4 of the Vollmer Report.

FRA 1-10. Does Ashland agree that it "should install, maintain, and bear the cost of flow monitoring equipment" at the two discharge points into the Framingham system, as recommended by Vollmer at page 6 of its report and as referenced at paragraph 4 of the IMA? If so, what plan does Ashland have for installing and maintaining these devices?

FRA 1-11. During the last five years, has Ashland taken flow measurements other than those taken by the MWRA at the

Chestnut Street pumping station? If so, please provide all such flow data (including pump run time meter records) and identify any differences between Ashland's flow numbers and the MWRA's flow numbers, on an average annual flow and peak instantaneous flow rate basis.

FRA 1-12. During the last five years, has Ashland taken flow measurements other than those taken by the MWRA at the Brackett Road pumping station? If so, please provide all such flow data (including pump run time meter records) and identify any differences between Ashland's flow numbers and the MWRA's flow numbers, on an average annual flow and peak instantaneous flow rate basis.

FRA 1-13. Does Ashland maintain flow and cost data for each element of the infrastructure of its sewer system (e.g., pipes, gravity sewers, pump stations, manholes, force mains, siphons, etc.)? If so, please provide this data for each force main connection to the Framingham sewer system, and for the Chestnut Street and Brackett Road stations, for the last five years.

FRA 1-14. Have there been instances of flow backup in the Chestnut Street pumping station? If so, please provide all data and documents associated with any such backups.

FRA 1-15. Has the comminutor bypass barrack been active for any period of time in excess of five days during the last

five years? If so, please provide all data and documents associated with such activity.

FRA 1-16. Please provide all data and documents reflecting the amount of Infiltration and Inflow in Ashland's collection system for the past five (5) years.

FRA 1-17. In each year during the last five years, what has been the peak flow discharged into the Framingham system at each of the two discharge points? Please provide all data and documents reflecting those peak flows.

FRA 1-18. Do the Brackett Road and Chestnut Street pumping stations have the capability to convey Ashland's peak flows at those locations?

FRA 1-19. Does Ashland agree with Vollmer Associates that "the discharge of hydrogen sulfide into [a sewer] system .. can cause severe deterioration of the sewer."? (Vollmer Report, p. 6).

FRA 1-20. Please provide all documents referencing or pertaining to the presence of hydrogen sulfide in the Ashland sewer system, and/or the discharge of sewage containing hydrogen sulfide into the Framingham system, including but not limited to correspondence, memoranda, notices of violation, reports, and sampling data.

FRA 1-21. Does Ashland agree that it should be responsible to pay Framingham some amount for the cost of future

capital repairs or improvements to the Framingham sewer system, as referenced at page 7 of the Vollmer report? If so, please set forth Ashland's position as to how its share of such future capital costs should be calculated, and provide copies of any documents supporting Ashland's position.

FRA 1-22. If Ashland were forced to construct its own connection to the MWRA system, please estimate Ashland's initial capital investment costs for such a connection, including the costs of obtaining land, permits, engineering services, and construction costs, as well as the average yearly cost to Ashland of carrying any borrowings that would be needed to establish such a connection. Please provide all workpapers relied upon to answer this request, as well as any reports or studies prepared by Haley & Ward regarding this issue.

FRA 1-23. If Ashland were forced to construct its own connection to the MWRA system, please estimate the annual costs to Ashland of operating and maintaining these additional parts of its system. Please provide all workpapers relied upon to answer this request, as well as any reports or studies prepared by Haley & Ward regarding this issue.

FRA 1-24. Please provide copies of the 1991 and 1997 Sewerage Facility Reports referenced in the October 10, 2001 memorandum attached to the Vollmer Report.

FRA 1-25. Please provide copies of all sections of Ashland's budgets for the 1999, 2000, 2001 and 2002 fiscal years that reflect, pertain to or reference any monies due or paid to Framingham in consideration for Ashland's use of Framingham's sewer system.

FRA 1-26. Please provide record drawings ("as-builts") of the upgrades to the Chestnut Street force main and gravity main. Also, please provide test results, if any, regarding infiltration/inflow into these pipes.

FRA 1-27. Please provide record drawings of the Route 126 sewer along Douglas Road, and in particular the pumping device leading to a catch basin located near the wastewater pumping station that was visible during the January 15, 2003 site visit.

FRA 1-28. Please state the date on which this pumping device was constructed, provide copies of any permits relating to the device, and provide copies of any records regarding flows through this device since it was constructed.

FRA 1-29. Please state the purpose of the device described in FRA 1-27. If so, please provide all documents referencing or pertaining to each such event.

FRA 1-30. Please state whether any of the flows intended to be pumped through the device described in FRA-127 were not so pumped, and entered the sewer system downstream of the Brackett Road flow meter.

FRA 1-31. Has Ashland performed any studies or created any design criteria for the sewers recently constructed and currently under construction? In particular, provide documents for the construction of the Route 126 interceptor, including criteria for pumping stations, force mains, gravity sewers, and any schedules for project completion and activation.

FRA 1-32. Are there recorded easements for the force mains leading to the two discharge points to the Framingham system? If so, please provide copies of any such easements.

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